

**Autumnwood ESH Consultants**

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15 October 2017

Mr. John Nordine
U.S. EPA Region 5
RCRA Enforcement and Compliance Assurance Branch (LU-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois RCRA CMI Monthly Progress Report, September 2017
EPA ID: ILD005178975

Dear Mr. Nordine:

Enclosed please find the RCRA CMI Monthly Progress Report for the Central Wire facility located in Union, Illinois for September 2017.

This report includes the eDMR for the groundwater pump & treat facility and the laboratory analytical reports, which include the effluent data used in the eDMR and the South Branch Nursery well samples for Volatile Organic Compounds.

If you have any comments or questions regarding the progress of this project, please contact me at (262) 237-1130.

Sincerely,

Autumnwood ESH Consultants, LLC

John W. Thorsen, P.E.

JWT:jt

encl

cc:	Joyce Munie	IEPA
	Robert Kay	USGS
	Gerald W. Ruopp	Central Wire
	Robert Johnson	Central Wire

MONTHLY PROGRESS REPORT
Central Wire Union, Illinois Site
September 2017

- 1 **Progress Made This Reporting Period** – In this reporting period Central Wire Inc. (CWI) continued the operation and maintenance of the groundwater extraction and treatment (P&T) system. CWI treated an average of 381,000 gallons per day (GPD) with a maximum daily flow of 457,000 GPD. The system was down for maintenance for five days, so equalizing that over the 30 day month would have resulted in an average of 457,200 gallons per day. Table 1, attached, lists the average daily P&T volumes by month from January 2015 through September 2017.

The monthly NPDES sample met effluent limitations for pH, 1,1,1-Trichloroethane (TCA), Trichloroethene (TCE) and Tetrachloroethene (PCE). The electronic Discharge Monitoring Report (eDMR) for the month is attached to this report.

The laboratory analytical report for the pump and treat effluent sample and the Ex. 6 Personal Privacy (PP) **Ex. 6 Personal Privacy (PP)** samples were collected on September 28, 2017 and arrived at Test America Laboratory on September 29, 2017 at 3.3° C. There were no volatile organic compound detections in any of the three South Branch Nursery samples.

Over the month Central Wire personnel read the hour meter on the Ex. 6 Personal Privacy (PP) pump engines for the Ex. 6 Personal Privacy (PP) on a weekly basis. Table 2 provides the data collected from the hour meters on the pump engines. This data is used in Table 3, attached, which plots the groundwater levels against the daily precipitation and weekly irrigation well pumpage in hours at Ex. 6 Personal Privacy (PP). The precipitation data is from the National Weather Service's Harvard station because the Marengo station did not have data for September 2017.

Table 2
Summary of 2017 Irrigation Pumping Hours per Week at Ex. 6 Personal Privacy (PP)
September 1 through October 3, 2017

Date of Hour Meter Reading	Ex. 6 Personal Privacy (PP)				Hours of Irrigation Well Pumping/Week
	Hour Meter Reading	Hours Pumped	Hour Meter Reading	Hours Pumped	
9/1/2017	6830	0	4496	0	0
9/5/2017	6851	21	4511	15	36
9/11/2017	6870	19	4547	36	55
9/18/2017	6925	55	4579	32	87
9/25/2017	6955	30	4618	39	69
10/3/2017	6971	16	4658	40	56
Totals		141		162	303

On October 3, 2017, Central Wire personnel downloaded the data logger tracking the depth of the groundwater in monitoring well DGW-2I in the field from September 1 through October 3, 2017 to a laptop computer and reinserted the same data logger into the well to collect the October data.

-2-

The groundwater level monitoring data from downgradient monitoring well DGW-2I for September 2017 has been graphed / plotted and is attached to this report as Table 3. The depth to water measured from the top of the well casing was 7.00 feet in DGW-2I on October 3, 2017. Therefore, there nominally was 23.34 feet of water above the data logger (30.34 ft. [depth of data logger] – 7.00 ft. [water level below Inside lip of protective cover]).

The groundwater elevation during this period reached its highest level on September 1 at 815.061 feet above mean sea level. The groundwater elevation reached its low on September 26 at 814.008 feet above mean sea level.

Central Wire met with representatives from Ex. 6 Personal Privacy (PP) on September 5, 2017. There was an agreement in concept to place the pump and discharge facility on the Ex. 6 Personal Privacy (PP) property. There has been no communication since that meeting.

On September 6, Central Wire received an email from IEPA (attached) approving the pump and discharge concept.

2 Summary of Validated Data and Results

Pump & Treat System NPDES Sampling

The monthly effluent sampling took place on September 28, 2017. The permit limitations and analytical results are shown in Table 4, below. There were no effluent limitation exceedances.

Table 4
Central Wire Union Illinois Pump & Treat Discharge Analytical Results

Parameter	Effluent Limitation (Daily Maximum) µg/L	Analytical Results, µg/L
1,1,1-Trichloroethane	20	< 0.38
Tetrachloroethene	20	< 0.44 J
Trichloroethene	20	0.92

J is >= to the Method Detection Limit and the concentration is an approximate value

Central Wire collected samples at the Ex. 6 Personal Privacy (PP) and the Ex. 6 Personal Privacy (PP) which is still being used to supply the toilet in the office on September 28, 2017. There were no detections of volatile organic compounds. These results are in the attached analytical reports.

This September 2017 NPDES analytical report also has environmental analytical results for Central Wire's North and South Seepage Ponds. These ponds are Illinois EPA-regulated seepage ponds for Central Wire's rinse waters from the annealing process, non-contact cooling water, boiler blowdown and storm water.

-3-

- 3 **Upcoming Events/Activities Planned** – Central Wire will continue to operate the existing remediation systems. Effluent samples will be collected, analyzed and reported as required in our NPDES permit. Central Wire will shortly reapply for the NPDES permit for this system adding a second discharge for the pump and discharge system.

Central Wire plans to meet as needed with [Ex. 6 Personal Privacy (PP)] work out details and schedules, but that work won't kick off until the NPDES permit is issued.

Central Wire is currently seeking a vendor to replace the [Ex. 6 Personal Privacy (PP)] well with a deeper well cased into the bedrock.

Samples will continue to be collected at the [Ex. 6 Personal Privacy (PP)] every month when the irrigation pumps are operating, usually between April and October of each year.

- 4 **Anticipated Problem Areas and Recommended Solutions** – None.

- 5 **Key Personnel Changes** – None.

- 6 **Target and Actual Completion Dates** – This project has not deviated from the project schedule.